# PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

# **Control Information**

INSPECTION START DATE: 5/6/2014
INSPECTION END DATE: 5/6/2014
OPERATOR ID: 32560

OPERATOR NAME: LAMB WESTON/BSW

STATE/OTHER ID: 0

**ACTIVITY RECORD ID NUMBER** 

COMPANY OFFICIAL: Andy Bateman
COMPANY OFFICIAL STREET: 1203 Basin Street

COMPANY OFFICIAL CITY: Warden
COMPANY OFFICIAL STATE: WA
COMPANY OFFICIAL ZIP: 98857

COMPANY\_OFFICIAL\_TITLE: Plant Manager PHONE NUMBER: (509) 349-2210

FAX NUMBER:

EMAIL ADDRESS: Marvin.Price@conagrafoods.com

WEB SITE:

TOTAL MILEAGE: 5

TOTAL MILEAGE IN HCA: 0

NUMBER OF SERVICES (DISTR): 0

ALTERNATE MAOP (80% RULE): 0

NUMBER OF SPECIAL PERMITS: 0

INITIAL DATE OF PAP: 1/3/2011

TITLE OF CURRENT PAP: Lamb Weston PAP

CURRENT PAP VERSION: 2

CURRENT PAP DATE: 2/1/2013

DATE SUBMITTED FOR APPROVAL:

DIRECTOR APPROVAL:

APPROVAL DATE:

OPERATORS COVERED UNDER PROGRAM:

UNITS COVERED UNDER PROGRAM:

# Mileage Covered by Public Awareness Program (by Company and State)

Based on the most recently submitted annual report, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

# Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

				GATHERING	TRANSMISSION	DISTRIBUTION*	
COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	INTRASTATE	INTRASTATE	INTRASTATE	REMARKS (new?)
LAMB WESTON/BSW	32560	nat gas	WA	0	4.5	0	

- 1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
- 2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
- 3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
- 4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
- 5. \*Please do not include Service Line footage. This should only be MAINS.

Please provide a comment or explanation for inspection results for each question.

# 1. Administration and Development of Public Awareness Program

# 1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

- Werify the operator has a written public awareness program (PAP).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator's PAP.
- Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- Merify the date the public awareness program was initially developed and published.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

<ul><li>S - Satisfactory (explain)</li></ul>
○ U - Unsatisfactory (explain)
O N/A - Not Applicable (explain)
O N/C - Not Checked (explain)

# **COMMENTS:**

# 1.02 Management Support

Does the operator's program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

- Werify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- Werify that an individual is named and identified to administer the program with roles and responsibilities.
- Merify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
- Determine if the operator uses external support resources for any implementation or evaluation efforts.

CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

• S - Satisfactory (explain)
○ U - Unsatisfactory (explain)
O N/A - Not Applicable (explain)
O N/C - Not Checked (explain)

# **COMMENTS:**

In 2013 Lamb Weston changed contractors and a new PAP wa witten. They were unable to complete the effectiveness evaluation prior to the 2013 inspection. This is the 2014 PAP Follow up Inspection.

# 1.03 Dnique Attributes and Characteristics

Does the operator's program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

- Werify the PAP includes all of the operator's system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

<ul><li>S - Satisfactory (explain)</li></ul>
$^{igcirc}$ U - Unsatisfactory (explain)
O N/A - Not Applicable (explain)
O N/C - Not Checked (explain)

# COMMENTS:

# 1.04 Stakeholder Audience Identification

Does the operator's program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience.
- Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

[	] Affected public
[	] Emergency officials
[	] Public officials
[	] Excavators

CODE REFERENCE: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f), API RP 1162 Section 2.2 and Section 3

$\odot$	S - Satisfactory (explain)
$\bigcirc$	U - Unsatisfactory (explain)
$\bigcirc$	N/A - Not Applicable (explain)
0	N/C - Not Checked (explain)

# **COMMENTS:**

In 2013 Lamb Weston changed contractors and a new PAP wa witten. They were unable to complete the effectiveness evaluation prior to the 2013 inspection. This is the 2014 PAP Follow up Inspection.

# 1.05 Message Frequency and Message Delivery

Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

• Identify where in the operator's PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

] Affected public
] Emergency officials
] Public officials
] Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

•	S - Satisfactory (explain)
$\bigcirc$	U - Unsatisfactory (explain)
$\bigcirc$	N/A - Not Applicable (explain)
$\bigcirc$	N/C - Not Checked (explain)

# **COMMENTS:**

#### 1.06 Written Evaluation Plan

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

- Merify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Merify the operator's evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences surveys and feedback.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

<ul><li>S - Satisfactory (explain)</li></ul>
○ U - Unsatisfactory (explain)
O N/A - Not Applicable (explain)
O N/C - Not Checked (explain)

# **COMMENTS:**

In 2013 Lamb Weston changed contractors and a new PAP wa witten. They were unable to complete the effectiveness evaluation prior to the 2013 inspection. This is the 2014 PAP Follow up Inspection.

# 2. Program Implementation

# 2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

- Determine if the operator delivers material in languages other than English and if so, what languages.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.

CODE REFERENCE: § 192.616 (g); § 195.440 (g), API RP 1162 Section 2.3.1

<ul><li>S - Satisfactory (explain)</li></ul>
$^{igcirc}$ U - Unsatisfactory (explain)
O N/A - Not applicable (explain)
O N/C - Not Checked (explain)

# **COMMENTS:**

# 2.02 Message Type and Content

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- Dse of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
- Physical indications of a possible release;
- Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
- Procedures to report such an event (to the operator)?
- Werify all required information was delivered to each of the primary stakeholder audiences.
- Werify the phone number listed on message content is functional and clearly identifies the operator to the caller.

<ul><li>[ ] Affected public</li><li>[ ] Emergency officials</li><li>[ ] Public officials</li><li>[ ] Excavators</li></ul>	
CODE REFERENCE: § 192.616 (d), (f); § 19	95.440 (d), (f)
	COMMENTS:
<ul><li>S - Satisfactory (explain)</li></ul>	In 2013 Lamb Weston changed contractors and a new PAP wa witten.
○ U - Unsatisfactory (explain)	They were unable to complete the effectiveness evaluation prior to the
○ N/A - Not applicable (explain)	2013 inspection. This is the 2014 PAP Follow up Inspection.
○ N/C - Not Checked (explain)	

# 2.03 Messages on Pipeline Facility Locations

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

• Merify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

	COMMENTS:
<ul><li>S - Satisfactory (explain)</li></ul>	In 2013 Lamb Weston changed contractors and a new PAP wa witten.
○ U - Unsatisfactory (explain)	They were unable to complete the effectiveness evaluation prior to the
O N/A - Not applicable (explain)	2013 inspection. This is the 2014 PAP Follow up Inspection.
O N/C - Not Checked (explain)	

2.04 Baseline Message Delivery Frequency	
1162, Table 2-1 through Table 2.3? If not, o	d messages meet or exceed the baseline frequencies specified in API RP did the operator provide justification in its program or procedural manual? rator's last five years of records) for the following stakeholder audiences:
[ ] Emergency officials	
[ ] Public officials	
[] Excavators	
CODE REFERENCE: § 192.616 (c); § 195.440	0 (c)
	COMMENTS:
S - Satisfactory (explain)	In 2013 Lamb Weston changed contractors and a new PAP wa witten.
○ U - Unsatisfactory (explain)	They were unable to complete the effectiveness evaluation prior to the
○ N/A - Not applicable (explain)	2013 inspection. This is the 2014 PAP Follow up Inspection.
O N/C - Not Checked (explain)	
2.05 Considerations for Supplemental Prog Did the operator consider, along all of its pi program enhancements as described in API [ ] Affected public [ ] Emergency officials [ ] Public officials [ ] Excavators	peline systems, relevant factors to determine the need for supplemental
Determine if the operator has considered a CODE REFERENCE: § 192.616 (c); § 195.44	nd/or included other relevant factors for supplemental enhancements. 40 (c), API RP 1162 Section 6.2
	COMMENTS:

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

O N/A - Not applicable (explain)

O N/C - Not Checked (explain)

# 2.06 Maintaining Liaison with Emergency Response Officials

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- Merify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify the operator's expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

<ul><li>S - Satisfactory (explain)</li></ul>
<ul><li>U - Unsatisfactory (explain)</li></ul>
O N/A - Not applicable (explain)
O N/C - Not Checked (explain)

#### **COMMENTS:**

In 2013 Lamb Weston changed contractors and a new PAP wa witten. They were unable to complete the effectiveness evaluation prior to the 2013 inspection. This is the 2014 PAP Follow up Inspection.

# 3. Program Evaluation & Continuous Improvement (Annual Impplementation Audits)

# 3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

• Merify the operator performed an annual audit or review of the PAP for each implementation year.

CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

<ul><li>S - Satisfactory (explain)</li></ul>
○ U - Unsatisfactory (explain)
O N/A - Not applicable (explain)
O N/C - Not Checked (explain)

# **COMMENTS:**

# 3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

•Determine how the operator conducts annual audits/reviews of its PAP.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

# **COMMENTS:**

In 2013 Lamb Weston changed contractors and a new PAP wa witten. They were unable to complete the effectiveness evaluation prior to the 2013 inspection. This is the 2014 PAP Follow up Inspection.

# 3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

- •Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.
- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

•	S - Satisfactory (explain)
$\bigcirc$	U - Unsatisfactory (explain)
$\bigcirc$	N/A - Not applicable (explain)
$\bigcirc$	N/C - Not Checked (explain)

# COMMENTS:

In 2013 Lamb Weston changed contractors and a new PAP wa witten. They were unable to complete the effectiveness evaluation prior to the 2013 inspection. This is the 2014 PAP Follow up Inspection.

# 4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)

# 4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Merify the operator conducted an effectiveness evaluation of its program program (or no more than 4 years following the effective date of program implementation).
- Document when the effectiveness evaluation was completed.
- •Determine what method was used to perform the effectiveness evaluation (in-house, by 3rd party contractor, participation in and use the results of an industry group or trade association).
- In the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

S - Satisfactory (explain)
U - Unsatisfactory (explain)
O N/A - Not Applicable (explain)
O N/C - Not Checked (explain)

# **COMMENTS:**

Bullet 1: Reviewed Annual and 4 year Evaluation

Bullet 2: 3-11-2014

Bullet 3: in house, door to door for effective public
Public officials personal visit
Emergency response is personal visit
Excavators certified mailings for the excavators in area and those requesting locates in Lamb Weston area

Bullet 4: 100% is same size

# 4.02 Measure Program Outreach

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- •Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.
- •Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).
- •Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

[]	Affected public
[]	<b>Emergency officials</b>
[]	Public officials
[]	Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

<ul><li>S - Satisfactory (explain)</li></ul>	
○ U - Unsatisfactory (explain)	
O N/A - Not Applicable (explain)	
O N/C - Not Checked (explain)	

# **COMMENTS:**

Comments:

Bullet 1: observation and land owners

Bullet 2: door to door for affected public, one on one with public officials and emergency responders and certified mailing for excavators

Bullet 3: Used 100% (line only 4.5 miles). Therefore no sample size or margin of error

# 4.03 Measure Percentage Stakeholders Reached

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

- Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.
- [] Affected public [] Emergency officials
- [] Public officials

[] Excavators

CODE REFERENCE: § 192.616) (c); § 195.440 (c), API RP 1162 Section 8.4.1

S - Satisfactory (explain)

U - Unsatisfactory (explain)

○ N/A - Not Applicable (explain)

O N/C - Not Checked (explain)

**COMMENTS:** 

Bullet 1: Used 100% for each group

Bullet 2: 100% reached

Reviewed list of homeowner signatures. All homeowners on list signed

Reviewed list of public officials and emergency responders. Each took paper survey and signed and dated. This was for city of Warden.

# 4.04 Measure Understandability of Message Content

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual? (Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2)

- •Examine the operator's evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.
- Werify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.

•Determine if the operator pre-tests materials.
[] Affected public
[] Emergency officials
[] Public officials
[] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

•	S - Satisfactory (explain)
$\bigcirc$	U - Unsatisfactory (explain)
$\bigcirc$	N/A - Not Applicable (explain)
$\bigcirc$	N/C - Not Checked (explain)

# **COMMENTS:**

Bullet 1: all understood and retained by written surveys they took and signed

Bullet 2: 100% public officials and emergency responders took surveys, affected public handed out information in door to door phase and went back to 2 of 15 homeowners and businesses in are took. They took written survey and understood and retained. For excavators out of 24 mailings called one and he took survey and did well. Others on list include CNG and Avista

Bullet 3: Did not use post tested materials

# 4.05 Measure Desired Stakeholder Behavior

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

- •Examine the operator's evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- Werify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

[] Affected public

[] Emergency officials

[] Public officials

[] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.3

S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

○ N/A - Not Applicable (explain)

○ N/C - Not Checked (explain)

# **COMMENTS:**

•Bullet 1: stakeholders have demonstrated the intended learned behaviors.

•Bullet 2: prevention behaviors have been understood those behaviors are taking place when needed.

# 4.06 Measure Bottom-Line Results

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

- •Examine the operator's process for measuring bottom-line results of its program.
- Merify the operator measured bottom-line results by tracking third-party incidents and consequences.
- •Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.4

• S - Satisfactory (explain)

○ U - Unsatisfactory (explain)

○ N/A - Not Applicable (explain)

○ N/C - Not Checked (explain)

# **COMMENTS:**

Bullet 1: Bottom line results is no damage, no incidents since PAP in place

Bullet 2: No 3rd party damage

# Bullet 3:

Table talk with all 22 volunteer firefighters, Lamb Weston provided pictures and tours of different areas in plant and for all gas lines and hazardous material and went thru different scenarios.

Discussion with police chief regarding safety and emergency response. With Fire chief meeting they discussed other pipelines and procedures in area.

# 4.07 Program Changes

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

- •Examine the operator's program effectiveness evaluation findings.
- Dentify if the operator has a plan or procedure that outlines what changes were made.
- Merify the operator identified and/or implemented improvements based on assessments and findings.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 2.7 Step 12 and 8.5

S - Satisfactory (explain)	
U - Unsatisfactory (explain)	
O N/A - Not Applicable (explain)	
O N/C - Not Checked (explain)	

# **COMMENTS:**

Bullet 1: Reviewed findings. Nothing changed

Bullet 2: No changes made

Bullet 3: No improvements implemented and this is justified in 4 year internal review.

# 5. Inspection

# SUMMARY:

In 2013 Lamb Weston changed contractors and a new PAP wa witten. They were unable to complete the effectiveness evaluation prior to the 2013 inspection. This is the 2014 PAP Follow up Inspection. No probable violations or Areas of Concern

FINDINGS: